



1095 Avenue of the Americas
New York, NY 10036-6797
+1 212 698 3500 Main
+1 212 698 3599 Fax
www.dechert.com

NEIL A. STEINER

neil.steiner@dechert.com
+1 212 698 3822 Direct
+1 212 698 0480 Fax

August 26, 2019

Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Joint Status Letter Regarding Discovery in the Matter *Common Cause/New York v. Brehm, et al.*, 1:17-cv-06770-AJN

Dear Judge Netburn:

We write on behalf of all parties and non-party New York City Board of Elections ("NYCBOE"), pursuant to this Court's Order dated August 5, 2019 (Docket No. 119), to advise the Court of the status of discovery. Pursuant to the July 26, 2019 Joint Status Letter we submitted to this Court, we expect that the NYCBOE will produce all non-privileged documents identified by using the search terms listed in the aforementioned July 26, 2019 letter by the end of this month. The parties have been instructed by the NYCBOE that they are in the process of reviewing the documents identified in the search for responsiveness and privilege.

Further, the parties have been in communication with the NYCBOE regarding the scheduling of a deposition of Michael Ryan. And, the NYCBOE advised today that Mr. Ryan is available for a deposition on either September 12 or 13.

We are available at the Court's convenience to address any questions.

Respectfully submitted,

/s/ Neil A. Steiner

Neil A. Steiner